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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 16-00227-SI-5
	)	
Plaintiff,	)	UNITED STATES' STATUS REPORT
	)	
v.	)	
	)	
BTC-E, A/K/A CANTON BUSINESS	)	
CORPORATION,	)	
	)	
and	)	
	)	
ALEXANDER VINNIK,	)	
	)	
Defendants.	)	

The United States of America ("the government") hereby submits this status report in the above-referenced matter to provide the Court with an update on its discovery productions since the parties' last appearance before the Court on December 16, 2022.

1  
2 The parties appeared before the Court for a status conference on December 16, 2022. [Dkt. No.  
3 40.] At the hearing, the Court ordered the government to provide the following discovery by February  
4 14, 2023: (1) All search warrants and returns for all digital data (excluding the Softlayer and Equinix  
5 servers for BTC-e) and financial records; (2) all ROIs; (3) all devices and all documents regarding the  
6 chain of custody; and (4) all documents in the government's possession relating to the French criminal  
7 case and Greek extradition proceedings against Mr. Vinnik.

8 The government has made eight discovery productions to defense counsel in this case, four of  
9 them since the last hearing. Specifically, the government has made discovery productions on the  
10 following dates: January 2, 7, and 25; and February 10, 2023. With certain limitations as conveyed to  
11 defense counsel and described below, the government has produced the four categories of discovery as  
12 ordered by the Court.

13 With respect to its discovery productions, the government has endeavored to provide data in an  
14 accessible form to the greatest extent possible. Certain files were stored in encrypted or password-  
15 protected format, requiring the application of passwords or keys to the data to review and produce the  
16 records. The government has told defense counsel that it can make copies of those items in their native,  
17 encrypted format, upon request. The government has also told defense counsel that it is continuing to  
18 work to access and decrypt several remaining items and will provide them as they are available.

19 Consistent with its prior conversations with defense counsel regarding the voluminous electronic  
20 discovery and as anticipated by the Court's order, the government has not produced full images of all the  
21 servers obtained in the investigation or the full collection of network traffic. However, the government  
22 has offered to make those items available to the defense for inspection and remains prepared to provide  
23 images of particular servers upon request.

24 The government has also notified defense counsel that certain information related to confidential  
25 informants, undercover operations, or sensitive ongoing investigations has been withheld but that, to the  
26 extent that information is discoverable, it will be provided in advance of trial. Once a trial date is set,  
27 the government will work with defense counsel to determine an appropriate discovery schedule for this  
28 subset of information.

1 The government has offered to meet and confer with defense counsel in advance of the hearing  
2 and remains willing to engage with defense counsel to the extent there are any outstanding questions or  
3 concerns regarding discovery.

4 Respectfully submitted,

5 STEPHANIE M. HINDS  
6 United States Attorney

7  
8 DATED: February 15, 2023

9 /s/  
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11 KATHERINE LLOYD-LOVETT  
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